

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

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SUSAN COONEY, )  
Plaintiff )  
 )  
v. )  
 )  
SAYBROOK GRADUATE SCHOOL AND )  
RESEARCH CENTER and )  
MAUREEN O HARA, Individually )  
Defendants )  
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**PLAINTIFF SUSAN COONEY'S SECOND REQUEST  
FOR PRODUCTION OF DOCUMENTS FROM DEFENDANT SAYBROOK**

Plaintiff Susan Cooney requests that the documents and things described below be produced by Defendant Saybrook Graduate School and Research Center (hereinafter "Defendant," and/or "Saybrook") for inspection and copying at the offices of plaintiff's counsel, within thirty (30) days from the date of service of these requests upon you, and you are further required to serve your formal written responses to the following requests.

**DEFINITIONS AND INSTRUCTIONS**

Plaintiff incorporates by reference all definitions and instructions contained within plaintiff's first request for production of documents to Saybrook.

**DOCUMENT REQUESTS**

40. All employment contracts and other documents between Saybrook and O'Hara relating to O'Hara's eligibility for performance bonuses, as president, between 1999 and 2005, and the calculation and/or payment of performance bonuses between 1999 and 2005.

41. All Saybrook annual reports, financial statements and any other reports showing Saybrook's budgeted or actual student enrollment, tuition revenues, and faculty expenditures between 1995 and the present.

Respectfully submitted,  
PLAINTIFF SUSAN COONEY,  
By her Attorneys,

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Dated: April 10, 2006